

From: (b) (6) @portlandalliance.com>
Sent: Tuesday, September 06, 2016 3:07 PM
To: HarborComments
Subject: Portland Business Alliance letter re: Portland Harbor Superfund site
Attachments: removed.txt; Portland Harbor Superfund site 09_06_16.pdf

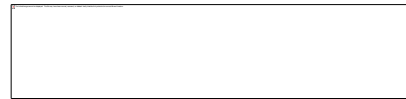
Importance: High

To Whom it May Concern:

Attached please find a letter from the Portland Business Alliance regarding the Portland Harbor Superfund site. If you have questions or concerns, please don't hesitate to contact me directly. Thank you for the consideration.

(b) (6)

Portland Business Alliance, *Greater Portland's Chamber of Commerce*
200 SW Market St., Ste. 150, Portland, OR 97201
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www.portlandalliance.com



Connect with the Alliance on:



September 6, 2016

Attn: Harbor Comments
U.S. Environmental Protection Agency
805 SW Broadway, Suite 500
Portland, OR 97205

To whom it may concern:

The Portland Business Alliance (Alliance) represents close to 1,900 small and large businesses that employ 350,000 workers in the Portland region. As the region's voice for business, the Alliance advocates for its members at all levels of government. Through its advocacy efforts, the Alliance supports private-sector job creation and retention, improvements in the region's educational attainment and a variety of other issues that affect our community's economic health and prosperity.

The Alliance supports cleaning up the Portland Harbor Superfund site to protect public health and the environment. The Alliance also supports doing so in a way that is mindful of the impacts on the economy, jobs and other important local priorities.

The cost of the cleanup will be borne throughout the community. In 2013, the Alliance commissioned a study that looked at the economic linkages from marine industrial businesses. The study analyzed vendors and suppliers to five large marine industrial businesses. At the time, 42 percent of the goods and services purchased by these five businesses were derived from local businesses, often small businesses. In all, about 300 local businesses are part of the supply chain for just five large marine industrial businesses.

And it's not just local businesses and local workers that will be impacted, local taxpayers and ratepayers will also be impacted because public entities, like the city of Portland, and utilities are potentially responsible parties.

As to the proposed plan:

- We are concerned about its cost-effectiveness and whether the proposed \$746 million estimate is accurate, particularly since there were little changes to the plan to justify the revised downward cost estimate. In other Superfund cleanups, EPA's cost estimate has been understated. With so many critical issues facing the city it's important to weigh the true cost of the project.
- We are concerned that the cost is also based on assumptions that may prove unrealistic, such as the nonstop dredging for seven straight years, which could also hamper business operations and recreational opportunities.
- Finally, we are concerned that the plan is not sufficiently flexible to allow site specific remedies. Contamination and risks are not uniform throughout the Portland Harbor. Flexibility would allow the cleanup to take into account changes in the river and site specific risks in a more cost-effective manner.

The legacy of contamination in the Portland Harbor, caused by activities going back over 100 years, has become the responsibility of this generation to fix. And we should do that.

But we should do it in a way that is protective of human health, the environment, and our local businesses, workers, taxpayers and ratepayers. We need to be using our public and private resources wisely, and we can only do that with a plan grounded in sound science that provides flexibility to address site specific risks.

Thank you for the opportunity to comment.

Sincerely,

(b) (6)

A large rectangular area of the document is redacted with a solid gray fill, obscuring the signature and any text that might have been present below the name.

President & CEO